

1 COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
2 SANFORD SVETCOV (36561)
ELI R. GREENSTEIN (217945)
3 100 Pine Street, Suite 2600
San Francisco, CA 94111
4 Telephone: 415/288-4545
415/288-4534 (fax)
5 sandys@csgrr.com
elig@csgrr.com
6 – and –
PATRICK J. COUGHLIN (111070)
7 655 West Broadway, Suite 1900
San Diego, CA 92101
8 Telephone: 619/231-1058
619/231-7423 (fax)
9 patc@csgrr.com

10 Lead Counsel for Plaintiffs

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA

13 In re VERIFONE HOLDINGS, INC.
SECURITIES LITIGATION

) Master File No. 3:07-cv-06140-MHP
)

14) CLASS ACTION
)

15 This Document Relates To:

) STIPULATION AND ~~PROPOSED~~ ORDER
) ALLOWING CONSOLIDATED BRIEFING
16) IN OPPOSITION TO DEFENDANTS'
17) MOTIONS TO DISMISS
)

16 ALL ACTIONS.
17

Pursuant to Civil L.R. 7-12, the parties hereby stipulate as follows:

1. On January 14, 2010, this Court entered the parties' Stipulation and Order Regarding Amendment of Complaint and Modification of Briefing Schedule for Defendants' Motions to Dismiss;

2. On January 19, 2010, plaintiff filed the Second Amended Consolidated Complaint for Violations of the Federal Securities Laws;

3. On March 5, 2010, defendants filed three separate motions to dismiss, as follows: (1) defendants VeriFone Holdings, Inc., Douglas Bergeron, William Atkinson and Craig Bondy filed one 25-page motion to dismiss; (2) defendant Barry Zwarenstein filed one 11-page motion to dismiss; and (3) defendant Paul Periolat ("Periolat") filed one 21-page motion to dismiss;

4. Defendants' respective motions to dismiss joined in and incorporated all other motions by reference;

5. The deadline for plaintiff's opposition brief(s) is April 19, 2010;

6. Pursuant to Civil L.R. 7-3(a) and (c), plaintiff ~~is permitted to file three separate 25-~~ **shall** **one 35-page** ~~page briefs in opposition to~~ **non-Periolat** ~~defendants' motions to dismiss; and~~

7. Plaintiff has opted to oppose defendant Periolat's motion in a separate 25-page opposition brief;

8. Plaintiff and the non-Periolat defendants believe it would be more efficient and cost effective to allow plaintiff to consolidate briefing for the non-Periolat defendants into one combined brief.

1 9. Although the non-Periolat defendants believe that such a combined brief should not
2 exceed 40 pages, as the parties previously stipulated in connection with plaintiff's prior opposition to
3 the motions to dismiss the previous Consolidated Complaint (Docket Entries 173-174), the non-
4 Periolat defendants have agreed to plaintiff's request for a combined opposition brief not to exceed
5 ~~45~~ ³⁵ pages in order to avoid a potential administrative motion on the issue.

6 IT IS SO STIPULATED.

7 DATED: March 30, 2010

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SANFORD SVETCOV
ELI R. GREENSTEIN

/s/

ELI R. GREENSTEIN

100 Pine Street, Suite 2600
San Francisco, CA 94111
Telephone: 415/288-4545
415/288-4534 (fax)

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
PATRICK J. COUGHLIN
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Plaintiffs

19 DATED: March 30, 2010

SULLIVAN & CROMWELL LLP
BRENDAN P. CULLEN
SCOTT C. HALL

/s/

SCOTT C. HALL

1870 Embarcadero Road
Palo Alto, CA 94303-3308
Telephone: 650/461-5600
650/461-5700 (fax)

Attorneys for Defendants VeriFone Holdings,
Inc., Douglas Bergeron, William Atkinson and
Craig Bondy

1 DATED: March 30, 2010

MORRISON & FOERSTER, LLP
BRIAN L. LEVINE

4 _____/s/
BRIAN L. LEVINE

5 425 Market Street
6 San Francisco, CA 94105-2482
7 Telephone: 415/268-7000
415/268-7522 (fax)

8 Attorneys for Defendant Barry Zwarenstein

9 I, Eli R. Greenstein, am the ECF User whose ID and password are being used to file this
10 STIPULATION AND [PROPOSED] ORDER ALLOWING CONSOLIDATED BRIEFING IN
11 OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS. In compliance with General Order
12 45, X.B., I hereby attest that Scott C. Hall and Brian L. Levine have concurred in this filing.

13 _____/s/
14 ELI R. GREENSTEIN

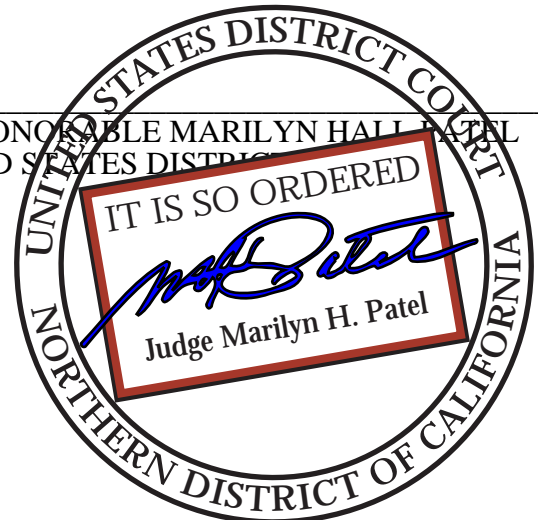
15 * * *

16 **ORDER**

17 PURSUANT TO STIPULATION, IT IS SO ORDERED. **AS MODIFIED**

18
19 DATED: 3/31/2010

20 THE HONORABLE MARILYN HALL PATEL
21 UNITED STATES DISTRICT COURT



CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 30, 2010.

/s/

ELI R. GREENSTEIN

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP

100 Pine Street, 26th Floor
San Francisco, CA 94111
Telephone: 415/288-4545
415/288-4534 (fax)

E-mail: elig@csgrr.com

Mailing Information for a Case 3:07-cv-06140-MHP

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Francis A. Bottini , Jr**
frankb@johnsonbottini.com,brett@johnsonbottini.com,derekw@johnsonbottini.com,paralegal@johnsonbottini.com
- **Brendan P. Cullen**
cullenb@sullcrom.com,carrejoa@sullcrom.com,singhl@sullcrom.com,halls@sullcrom.com
- **Timothy Alan DeLange**
kristinas@blbglaw.com,timothyd@blbglaw.com
- **Jordan Eth**
jeth@mofo.com,nurbina@mofo.com
- **Daniel C. Girard**
dcg@girardgibbs.com,akl@girardgibbs.com
- **Eli Greenstein**
e_file_sf@csgrr.com,Elig@csgrr.com,e_file_sd@csgrr.com
- **Stanley M. Grossman**
smgrossman@pomlaw.com
- **Nicole Catherine Lavallee**
nlavallee@bermandealerio.com,ysoboleva@bermandealerio.com
- **Brian Lawrence Levine**
BLevine@mofo.com,vvandergrift@mofo.com
- **Jonathan Krasne Levine**
jkl@girardgibbs.com
- **Jeremy A Lieberman**
jalieberman@pomlaw.com
- **Mark Cotton Molumphy**
mmolumphy@cpmlegal.com,jhamilton@cpmlegal.com,jthigpen@cpmlegal.com,obacigalupi@cpmlegal.com,bgoldman@cpmlegal.com
- **Alan Roth Plutzik**
aplutzik@bramsonplutzik.com
- **Juden Justice Reed**
plee@schubert-reed.com,akeng@schubert-reed.com,rschubert@schubert-reed.com
- **Patrick David Robbins**
probbins@shearman.com,rcheatham@shearman.com
- **Dana Anthony Rodriguez**
drodriguez@mofo.com,cpeplinski@mofo.com
- **Eran Rubinstein**
erubinstein@chitwoodlaw.com
- **Robert C. Schubert**
rschubert@schubertlawfirm.com
- **Aaron M. Sheanin**
ams@girardgibbs.com,ras@girardgibbs.com,amv@girardgibbs.com
- **Arthur L. Shingler , III**
ashingler@scott-scott.com,ssawyer@scott-scott.com
- **Michael Howard Steinberg**
steinbergm@sullcrom.com
- **Sean Travis Strauss**
sean.strauss@shearman.com
- **Steven Noel Williams**
swilliams@cpmlegal.com,jverducci@cpmlegal.com,cwalker@cpmlegal.com,rjit@cpmlegal.com,aliang@cpmlegal.com,medling@cpmlegal.com,pmenzel@cpmlegal.cc

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)